

1 Hatteras.

2 **Q. Do you know who at Merchants & Medical was**
3 **responsible for establishing that relationship?**

4 A. I believe it was the late owner of our company
5 -- of the company.

6 **Q. And have you ever seen a contract between**
7 **Merchants & Medical and Hatteras?**

8 A. We don't -- we do not have a -- we don't have a
9 contract with them.

10 **Q. Okay. Without a contract, how do you determine**
11 **the amount that Merchants & Medical has to pay**
12 **Hatteras for the sending of a letter?**

13 A. That information was negotiated -- most prices
14 were negotiated with the owner.

15 **Q. But you don't think they were ever memorialized**
16 **into a contract?**

17 A. I've been told that they were not.

18 **Q. Okay. Do you know if those prices have changed**
19 **at any point since Merchants & Medical first**
20 **began working with Hatteras?**

21 A. I do not have firsthand knowledge of specific
22 dollar value changes, but I imagine that values
23 have changed as postage has changed.

24 **Q. Who is Merchants & Medical's contact at**
25 **Hatteras?**

1 A. I think her name is Lori. She's our sales
2 executive. I believe her name is Lori.

3 **Q. And do you know her address and telephone**
4 **number?**

5 A. It is their corporate address in Plymouth. I
6 think it's on Haggerty.

7 No, I'm sorry, Lincoln Puffer is our
8 sales representative, and the address is 13200
9 North Haggerty, and that is Plymouth, Michigan.
10 I do not have a zip code.

11 **Q. And do you have a telephone number?**

12 A. I Google it each time, so I don't know right
13 off the top of my head.

14 **Q. Okay, but if I were to Google Hatteras, Inc.,**
15 **it would be the number that would come up?**

16 A. That's how I reach them.

17 **Q. Okay. And how often do you speak with**
18 **Hatteras?**

19 A. It's been a long time since I spoke with them
20 on the phone.

21 **Q. All right.**

22 A. Maybe once every couple years. I don't
23 typically have a lot of need to talk to them.

24 **Q. Do you know if any other individual at**
25 **Merchants & Medical speaks to Hatteras on a**

1 **regular basis?**

2 A. I don't know. I don't think so.

3 Q. **Okay. How are those SOC audits received by**
4 **Merchants & Medical? Are those just sent over**
5 **to you by some type of electronic method?**

6 A. I don't remember if they emailed them or they
7 mail them to us. We get SOC audits from
8 numerous clients, and some email them, some
9 mail them.

10 I'm sorry, I said clients. I meant
11 vendors.

12 Q. **I understood what you meant, but thank you for**
13 **clarifying.**

14 **Do you know what type of Safeguards**
15 **Hatteras has in place to protect consumer data**
16 **from data breaches?**

17 A. Without revealing any significant detail that's
18 contained in their SOC audit, I would say that,
19 after reading it, it appears that they take
20 data security, data protection, seriously, and
21 their auditors noted no findings on their
22 processes, procedures or controls, et cetera.

23 But it appears to me through their
24 SOC audit that they have pretty stable data
25 security.

1 been reduced to a written transcript. It's an
2 inappropriate question. He can stand on his
3 answer.

4 That's all I'm going to say about
5 this. This is absurd actually. Go ahead,
6 continue.

7 MR. FREEMAN: Okay, Charity, I again
8 appreciate your opinion. It's, as usual,
9 incredibly insightful.

10 BY MR. FREEMAN:

11 **Q. So, has anyone from Merchants & Medical ever**
12 **been to Hatteras' facility?**

13 A. I believe so, yes.

14 **Q. Who would that have been?**

15 A. I believe the late owner of our company. I'm
16 pretty sure that he has.

17 **Q. And when would that visit have occurred?**

18 A. I seem to remember him telling me back in the
19 2000s, meaning between 2000 and 2009.

20 **Q. And when did he pass away?**

21 A. 2011 -- I believe 2011.

22 **Q. How many times has Merchants & Medical been**
23 **sued for a violation of 15 USC 1692c(b)?**

24 A. I don't have a count of how many times we've
25 been sued for that.